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Comments on Animal ID Plan

When most topics of conversation in and around USDA these days center on budget, consolidations, rightsizing and how best to utilize the current existing structure and workforce, the plans for the National Animal Identification System (NAIS) seem to be in direct opposition to these mandated goals. The proposals as outlined in the Plan call for increasing staff for APHIS to meet the demands of implementing nationwide animal ID. I have no doubt but what APHIS is the proper agency to spearhead the animal ID program. However, that fact alone does not automatically warrant the need for an increase in staffing in that agency for one sole purpose.

From a USDA wide perspective, increasing APHIS staffing solely for the Animal ID program seems to be a considerable duplication of current capabilities. If the administrators of the various agencies within USDA would spend more time cooperating and less time worrying about protecting their own turf, considerable efficiencies and savings would be recognized.

Capabilities currently exist within the Farm Service Agency (FSA) to completely and adequately fulfill many of the items listed within the draft plan. For example:

- Premise registration and annual update/review requirements
- Annual Test Exercises
- Outreach and training

Rather than plunging forward to develop and implement NAIS as called for in the plan by increasing APHIS staff, it would make more sense to determine and utilize current assets within USDA for NAIS implementation.

FSA is a natural fit for many of the steps in the overall process. First and foremost, farmers are familiar with and comfortable working with FSA employees, so it would make sense that the first point of contact for the farmer would be the local FSA office.

Many already in-place assets within USDA-FSA would automatically and easily adapt to the NAIS:

- Probably the most complete name & address database for livestock producers of any USDA agency.
- Workforce that is familiar with livestock producers within the county.
- GIS capabilities: layers of data could be added to already existing GIS programming for each livestock enterprise indicating map location, type of livestock, number of animals, GPS coordinates, ability to isolate and identify other producers within a determined area and any additional GIS related specific information called for in the NAIS plan.
- Workforce already trained in GIS technology and capabilities.
- Emergency Boards, of which FSA is permanent chairperson, and extensive background on working with other state and federal agencies on emergency programs.
- Established office presence in most counties in the U.S.

In summary, FSA has much to offer in the implementation of a NAIS program. Simply through a collaborative effort and putting to good use the already established potential from other agencies within USDA, many efficiencies and savings can be realized. When budgets are the buzzword of the day, it seems only logical to capitalize on these efficiencies. FSA has had unprecedented success in implementing nationwide livestock, disaster and other agricultural programs. FSA already has the capability to provide valuable services to the implementation of NAIS with little or no additional cost, where other alternatives even within APHIS would require extensive start up costs for offices, staff and training. When combined with FSA's strategic office locations, in-place and on-board GIS and GPS capabilities and extensive database of livestock producers names and addresses, it only makes complete common sense to fully utilize these FSA capabilities.

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